IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

DKC 05 CV 1546

SENORA ATAKULU P.O. Box 471805 District Heights, MD 20753	*	
Plaintiff	*	
- v -	*	Case No. CAL05-10049
SUPERVALU INC t/a Shoppers Food Warehouse serve: Resident Agent: Corporation Trust, Inc. 300 E. Lombard Street Baltimore, MD 21202	*	
Defendant	*	

CLERK OF THE CIRCUIT COURT
2005 MAY 18 AM 9: 23
PR GEO CO MD

COMPLAINT - NEGLIGENCE
(Slip and Fall)

Comes now the Plaintiff, Senora Atakulu, through her attorney, Thomas Griffin, and files the following Complaint - Negligence (Sip and Fall), representing unto this Honorable Court as follows:

1. Plaintiff Senora Atakulu is an adult citizen of Prince George's County, Maryland.

2. Defendant SUPERVALU INC is a corporation entitled to do business in the State of Maryland, doing business as Shoppers Food Warehouse which is a retail supermarket company.

3. On or about the 31st day of July 2004, Ms. Atakulu went to the Shoppers Food Warehouse located at 6111 Livingston Road, Oxon Hill, Maryland 20745.

4. The purpose of her visit was to do her regular shopping as a retail customer and business invitee of the Defendant SUPERVALU INC.

5. July 31st 2004 was a Saturday and at approximately 1:50 p.m. in the afternoon, Ms. Atakulu was pushing a shopping cart up and down the aisles in the process of selecting purchases.

6. As she was proceeding down the soda aisle, she stepped upon a liquid substance on the floor and slipped and fell.

7. The Defendant was negligent in that the Defendant knew, or should have known, of the condition of the premises including the liquid substance on the floor in the soda aisle and failed to use reasonable care to prevent injury to business invitees including Ms. Atakulu.

8. Senora Atakulu exercised at all times, due care for her safety.

9. As a direct and proximate result of the negligence of the Defendant, SUPERVALU INC, Senora Atakulu received personal injury, requiring extensive treatment, lost wages and other general damages including pain and suffering.

WHEREFORE, the Plaintiff respectfully prays damages in the amount of One Hundred Thousand Dollars ($100,000.00).

Thomas Griffin
Attorney for Plaintiff
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